

From: [Meredith Alexander](#)
To: [ARB Clerk of the Board](#)
Subject: comments submitted last night on ACC II docket not posted on the website?
Date: Wednesday, June 1, 2022 12:33:22 PM
Attachments: [Final EV100 ACCII Public Comment.pdf](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I submitted comments last night (around 8pm) on the ACC II docket
https://www.arb.ca.gov/lispub/comm/iframe_bccommlog.php?listname=accii2022&_ga=2.93252445.1126223883.1654111424-2098447462.1654111424

I listed my client, Richard Parker of The Climate Group as the submitting party with all of his contact information completed (address and phone #). Attached are the comments I uploaded, which were saved at 8pm last night.

I have been advocating before CARB for many years and have never had this happen where my comments were not posted. Could you please check on the back end and see what happened? Can you find a submission from Richard Parker? Was the attachment rejected for some reason?

I had to re-start my computer this morning so I unfortunately no longer have the confirmation page on my web-browser showing "your comments have been received"

Thank you so much for your help. Obviously my client will be very unhappy if they find out that their comments were somehow not received!

Thank you very much,

Meredith Alexander



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May 31, 2022

Chair Liane Randolph
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Chair Randolph, Vice Chair Berg, and members of the California Air Resources Board,

I write on behalf of the Climate Group's EV100 program. We first want to express our overall support for the Advanced Clean Cars II (ACC II) regulation, along with our appreciation for your continued leadership cementing California's position as a climate leader both domestically and internationally. The proposed regulation will lead to improved health outcomes across the state, a reduction in transportation emissions (the state's highest emitting sector), creation of high-quality manufacturing jobs in California, a more rapid U.S. automotive industry evolution, and major fuel cost savings for Californians. The impact of the California Air Resource Board (CARB) regulations extends far beyond the state's borders, as 17 other states¹ have now adopted California's original Advanced Clean Car standards, which along with California make up about 40% of the country's total new light duty vehicle (LDV) market. Countries around the world look to California's leadership in the area of clean transportation policy, making it critical to set appropriately ambitious requirements, especially regarding the zero-emission vehicle (ZEV) regulation. **While we appreciate CARB's critical leadership on this issue, we believe a 100% ZEV sales mandate is possible before 2035, and that more ambitious interim targets are possible and needed to meet California's climate goals.**

Introduction

EV100 is a global initiative of Climate Group, with 122 members committed to electrifying their fleets and deploying charging infrastructure to make electric transportation the "new normal" by 2030. EV100 members are leading global businesses focused on accelerating electric vehicle (EV) adoption. Across the U.S., 2 million fleet vehicles are committed to be fully electric by 2030 through commitments made with EV100. EV100 companies have also committed to installing 708 new EV charging locations at company facilities across the country.

¹ <https://ww2.arb.ca.gov/sites/default/files/2022-03/%C2%A7177%20States%20%283-17-2022%29%20%28NADA%20sales%29.pdf>

This number includes New Mexico, who recently adopted the original Clean Cars standards in May 2022.



Comments on Proposed ZEV Regulation

We first want to acknowledge CARB Staff for increasing the ZEV regulation annual requirements from 26% for model year (MY) 2026 and 61% for MY2030 from the December 2021 draft Staff proposal to 35% for MY2026 and 68% for MY2030 in the Initial Statement of Reasons² (ISOR). However, if adopted as proposed, these requirements will fall short of what CARB has found to be necessary to decrease transportation emissions as rapidly as our climate mandates require.³

According to a recent report, all new cars and light-duty trucks sold in California must be zero-emission by 2030 to reach the 2045 carbon neutrality goal laid out in SB 32.⁴ Therefore, we support more ambitious ZEV sales targets for both MY2026 and MY2030. Governor Newsom’s 2020 Executive Order called for “bold action” to strengthen California’s “long-term economic resilience” and “eliminate emissions from transportation.”⁵ Requiring 100% ZEV sales before 2035, paired with achievable near-term requirements, is the bold action necessary to reach the state’s climate targets.

The Staff Proposal for ZEV sales requirements in the ISOR aligns with CARB’s “Slow Phase” scenario (shown in Figure 1) – we are calling on CARB to increase the ZEV annual requirements to be more in line with the “ASAP” scenario.

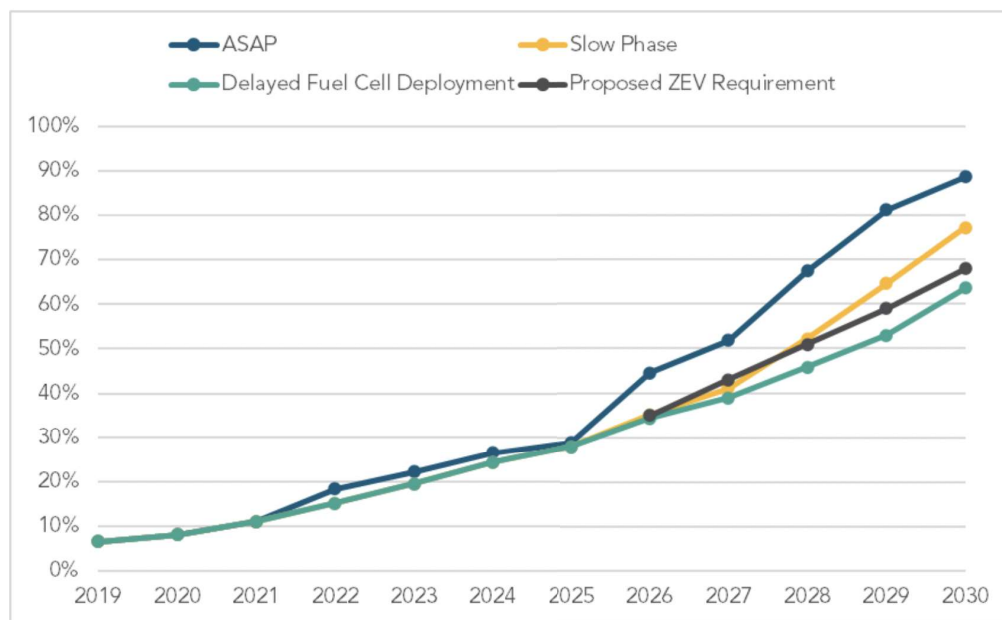


Figure 1: CARB ZEV market share scenarios from the Initial Statement of Reasons demonstrating that the currently proposed ZEV Requirement does not even meet the “Slow Phase” scenario.

EV100 recommends that CARB adopt a more ambitious MY2026 ZEV requirement.

According to EVAdoption, an independent market analysis and consulting firm, California’s new vehicle sales forecast is already projected to reach a 35% battery-electric vehicle (BEV) sales share by 2025,⁶ not including plug-in hybrids (PHEVs). California has already surpassed EVAdoption’s

² <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/accii/isor.pdf>

³ https://ww2.arb.ca.gov/sites/default/files/2021-09/Proposed_2020_Mobile_Source_Strategy.pdf

⁴ https://www.biologicaldiversity.org/programs/climate_law_institute/pdfs/All-Electric-Drive-California-zero-emissions-vehicles-report.pdf

⁵ <https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf>

⁶ <https://evadoption.com/ev-sales/ev-sales-forecasts/>

2021 and 2022 BEV sales projections. ZEVs made up over 16%⁷ of new LDV sales in the first quarter of 2022, up from 12.41% in 2021, 7.78% in 2020, and 6.84% in 2019 – demonstrating an average 35% annual rate of growth during this period. If this growth rate were to continue,⁸ California would reach 54.2% new vehicle ZEV sales by 2026.

We echo the letter submitted by a coalition of NGOs to the CARB Board in March of 2020:

The starting sales target of 35% has moved closer to the 45% identified as necessary in the Mobile Source Strategy. However, CARB’s own data show that 35% is essentially in line with business-as-usual projections from the OEMs themselves. Given the OEMs’ expectations of high ZEV sales prior to the regulation, existing flexibilities . . . and new credit generating opportunities . . . in S. 177 states, there is a significant risk that actual ZEV sales will fall short of the nominal requirement. Excessive flexibility may therefore undermine air quality benefits in California while also delaying the mass production . . . needed to mainstream ZEVs for low and moderate-income drivers.⁹

We agree that the ISOR’s proposed 35% ZEV sales share requirement for MY2026 represents a “business-as-usual” target. We call on CARB to do what it has historically done successfully: pass a regulation that will put us on the path to more rapid growth than the market would do on its own. As emphasized by the National Resources Defense Council: “the MY2026 standard should be designed by ARB Staff to send a signal to OEMs to encourage additional investment in deployment increases from MY2023 to MY2025 beyond the baseline, such that a larger step-increase in the regulatory requirements can and should occur for MY2026.”¹⁰ This increase is not only possible but has been achieved in countries around the world.

CARB should follow its own precedent of setting more ambitious targets than what is expected by increasing the stringency of the MY2026 ZEV requirement to 45% for the 2026 model year, as supported by many organizations in their comments on the October 2021 workshop¹¹ and in a recent letter to the CARB Board.¹²

The ISOR’s ZEV regulation represents an annual average 18% growth rate for MY2026 to MY2030, far below California’s historical 35% annual growth rate (compound average from 2011 to 2021) and dwarfed by the over 60% annual growth rates in various European countries.¹³ Globally, the “share of new passenger EVs has increased at an average of around 50% per year”¹⁴ since 2015, which would result in a market share of over 50% of new vehicle sales by 2026.

⁷ <https://www.energy.ca.gov/data-reports/energy-insights/zero-emission-vehicle-and-infrastructure-statistics/new-zev-sales>

⁸ Assuming 16.32%, the Q1 new vehicles ZEV sales share, to be the annual sales share for 2022

⁹ <https://static1.squarespace.com/static/620de700d847b7640ba983f1/t/6257216e03490316eca688c5/1649877360051/ACC+II+Equity+Credit+Letter+3-28-22%5B99%5D.pdf>

¹⁰ <https://www.arb.ca.gov/lists/com-attach/26-accii-comments-w3-ws-VDpdKYYzWWkGXwJh.pdf>

¹¹ <https://www.arb.ca.gov/lists/com-attach/12-accii-comments-w3-ws-VjAFall9BzUKYAdY.pdf>

¹² <https://static1.squarespace.com/static/620de700d847b7640ba983f1/t/6257216e03490316eca688c5/1649877360051/ACC+II+Equity+Credit+Letter+3-28-22%5B99%5D.pdf>

¹³ <https://www.arb.ca.gov/lists/com-attach/26-accii-comments-w3-ws-VDpdKYYzWWkGXwJh.pdf>

¹⁴ <https://www.wri.org/insights/what-projected-growth-electric-vehicles-adoption>

Although EV sales won't follow this trajectory exactly, this demonstrates exponential growth in the EV market globally. As a leading EV market, California will likely be above the global average at that point.

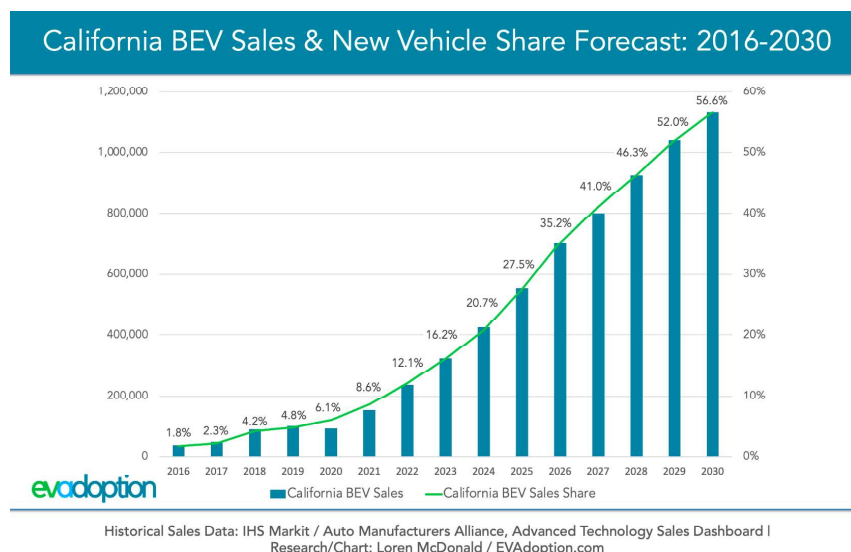


Figure 2: EVAdoption's BEV sales projections in California through 2030.

EV100 recommends that CARB require 100% or at least 75% for the MY2030 ZEV regulation.

Many automakers have announced the electrification of large portions of the fleet offerings in the next decade,¹⁵ with at least eight committed to full electrification by 2030 or sooner,¹⁶ as noted in CARB's Appendix G: ACC II ZEV Technology Appendix.¹⁷ According to the ZEV market share scenarios shown in Figure 1, the currently proposed 2030 requirement does not even meet Staff's Slow Phase scenario. The Slow Phase results in an over 75% market share by 2030, and based on ongoing automaker commitments, we believe that California is headed on a track that falls between the Slow Phase and ASAP scenarios. We think it is reasonable to increase the MY2030 ZEV regulatory requirement. As EVs continue to be one of the state's top exports,¹⁸ there are strong economic reasons as well for continuing California's leadership.

At the beginning of 2021, California had developed over 70,000 jobs related to ZEVs and charging infrastructure.¹⁹ California will be able to grow this job market by maintaining its leadership position on ZEV sales policy. With \$384 million of federal funding from the National Electric Vehicle Infrastructure Formula Program dedicated to California over the next five years, along with various other sources of funding for EV charging in the Bipartisan Infrastructure Law;²⁰ numerous charging installation rebates;²¹ and additional charging commitments by EV100 companies; EV charging is becoming more accessible to drivers across the state.

¹⁵ <https://www.consumerreports.org/hybrids-evs/why-electric-cars-may-soon-flood-the-us-market-a9006292675/>

¹⁶ <https://mashable.com/article/traditional-carmakers-going-all-electric-vehicles> Automaker goals for full portfolio electrification by 2030 or sooner are Jaguar Land Rover (2025), Bentley (2030), Mini (2030), Fiat (2030), Volvo (2030), Cadillac (2030), Mazda (2030), and Mercedes-Benz (2030).

¹⁷ <https://www2.arb.ca.gov/sites/default/files/barcu/regact/2022/accii/appg.pdf>

¹⁸ <https://www.gov.ca.gov/2022/05/10/as-statewide-zev-sales-exceed-16-percent-of-all-new-vehicles-california-zev-program-surpasses-250000-point-of-sale-incentives/>

¹⁹ <https://calstart.org/wp-content/uploads/2021/02/CA-ZEV-Jobs-Study-Final-0203.pdf>

²⁰ https://www.transportation.gov/sites/dot.gov/files/2021-11/Bipartisan_Infrastructure_Law_California.pdf

²¹ <https://cleanvehiclerebate.org/en/ev/technology/fueling/electric>

Conclusion

CARB has the rare opportunity to demonstrate to the country and world how quickly 100% road transportation electrification can be achieved and to maintain its position as a global policy leader. Other global climate leaders are setting the tone for more ambitious ZEV requirements: Washington state has included a 2030 phaseout goal for gas-powered cars in their state transportation plan,²² Norway has a 100% ZEV goal by 2025,²³ and Germany, a top vehicle producer, is now backing²⁴ the European Union's 2035 internal combustion vehicle phaseout.²⁵ **To continue leading the world, California must set a 100% ZEV sales requirement sooner than 2035.**

EV100 companies have committed to electrifying 5.5 million vehicles globally by 2030, 2 million of which are in the U.S. This will lead to great demand for the light-duty EVs that the ACC II regulation will spur production of. EV100 members expect that EVs will be produced by more OEMs and easier to procure, so that achieving their commitments will also drive faster market growth and transformation. EV100 companies are also committed to providing EV charging, with “708 charging locations ... committed in the U.S., whilst 312 locations are already up and running with 2,534 charging units.”²⁶ EV100 is committed to supporting the transition to full on-road transportation electrification by 2030 through fleet electrification, installing charging, and supporting the creation of enabling policy environments.

We thank you for your ongoing commitment to California's climate and air quality, and appreciate the opportunity to comment on the ISOR. We look forward to continuing discussions with you and CARB Staff as to how we may best assist in achieving rapid statewide transportation electrification.

Sincerely,

/s/
Angela Barranco
Executive Director
The Climate Group

²² <https://www.seattletimes.com/seattle-news/transportation/wa-sets-2030-goal-to-phase-out-gas-cars/>

²³ <https://elbil.no/english/norwegian-ev-policy/>

²⁴ <https://www.bloomberg.com/news/articles/2022-03-17/germany-backs-eu-plan-for-only-zero-emissions-new-cars-by-2035>

²⁵ <https://www.forbes.com/sites/michaeltaylor/2021/07/14/eu-suggests-date-for-the-end-of-combustion-powered-cars-suvs/?sh=503cc5fa7a67>

²⁶ https://www.theclimategroup.org/sites/default/files/2022-03/EV100%20Progress%20and%20Insights%20Report%202022_0.pdf